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Mr. Ernest G. Johnson Director, Utilities Division AZ CORP COMMISSION DOCUMENT CONTROL

Arizona Corporation Commission 1200 West Washington Street Phoenix, Arizona 85007

Re: Compliance Filing – Docket No. T-03406A-04-0232, Decision No. 67977

Eschelon Telecom of Arizona, Inc.

Dear Mr. Johnson:

In its Decision No. 67977, in Docket No. T-03406A-04-0232, the Commission ordered that by June 30 of each year Eschelon Telecom of Arizona, Inc. (Eschelon) was to "provide to Staff the allocated Arizona percentage of actual capital expenditures by the categories listed on the Company's website and provided to the Securities and Exchange Commission." Eschelon has analyzed its 2005 capital expenditures and determined the following with respect to the percentage of each expenditure category applicable to the Company's Arizona operations:

Vehicles	11%
Furniture and Fixtures	19%
Leasehold Improvements	0%
Switch Equipment	5%
Capitalized Labor	1%
Capitalized Customer Installations	15%

Arizona Percentage of Total Company/
Total Capital Expenditures 6%

I have enclosed the original and 14 copies of this filing. Please date stamp one copy and return it in the enclosed, self-addressed stamped envelope for our records. Please contact the undersigned with questions or concerns.

Sincerely.

Cathy Murray

Manager, Regulatory Affairs Eschelon Telecom, Inc.

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cc: Christopher C. Kempley, Esq., Chief Counsel, Legal Division, ACC